

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

CEDARVIEW MART, LLC, individually
and on behalf all others similarly situated,

Plaintiff,

v.

Case No. 3:20-cv-00107-NBB-RP
Hon. Neal B. Biggers

**STATE AUTO PROPERTY
AND CASUALTY COMPANY,**

Defendant.

APPLICATION FOR ADMISSION PRO HAC VICE

TO: THE HONORABLE JUDGE OF SAID COURT AND ALL PARTIES:

COMES NOW MARK L. HANOVER, and moves for approval of her admission to practice *pro hac vice* before this Court on behalf on Defendant STATE AUTO PROPERTY AND CASUALTY INSURANCE COMPANY, in this styled cause only, support thereof would respectfully show as follows:

(A) Name: Mark L. Hanover
 Firm Name: Dentons US LLP
 Office Address: 233 South Wacker Drive, Suite 5900
 Chicago, Illinois 60606-6361
 (312) 876-3145
 mark.hanover@dentons.com

(B) Mr. Hanover seeks admission *pro hac vice* to represent Defendant, State Auto Property and Casualty Insurance Company. Mr. Hanover is a “non-resident attorney” as defined by L.U.Civ.R. 83.1(d).

Client(s): State Auto Property and Casualty Company
Address: 518 East Broad Street
 Columbus, Ohio 43215

Phone: 833-724-3577

The following information is optional:

Has Applicant had a prior or continuing representation in other matters of one or more of the clients Applicant proposes to represent and is there a relationship between those other matter(s) and the proceeding for which Applicant seeks admission?

Does Applicant have any special experience, expertise, or other factor that Applicant believes makes it particularly desirable that Applicant be permitted to represent the client(s) Applicant proposes to represent in this case?

Mark Hanover has represented Defendant (and its affiliates) in prior putative class actions alleging improper claims adjustment practices. Additionally, Mark Hanover is currently representing other insurance carriers in Mississippi in putative class actions filed by the same plaintiffs' counsel, raising the same allegations. *See below* at (G) (*Huey and Tashal Shields*).

(C) **Applicant is admitted to practice in the:**

 X State of Illinois

and is currently in good standing with that Court. A certificate to that effect, issued within ninety days of the date of this Application, is enclosed as Exhibit A. The physical address, telephone number and website/email address for that admitting Court are:

Illinois Supreme Court
Supreme Court Building
200 East Capitol
Springfield, IL 62701-1721
Tel. 217-782-2035
www.illinoiscourts.gov/SupremeCourt

All other courts before which Applicant has been admitted to practice:

Jurisdiction

Period of

Admission

Illinois Supreme Court	1993
U.S. District Court for the Northern District of Illinois	1/31/1995

U.S. Court of Appeals for the Seventh Circuit
 U.S. District Court for the Central District of Illinois

1/1/1997
 7/5/2007

- | | | YES | NO |
|-----|---|-----|----------|
| (D) | Has Applicant been denied admission pro hac vice in this state? _____ | | <u>X</u> |
| | Has Applicant had admission pro hac vice revoked in this state? _____ | | <u>X</u> |
| | Has Applicant been formally disciplined or sanctioned by any court in this state in the last five years? _____ | | <u>X</u> |

If the answer was "yes," describe, as to each such proceeding, the nature of the allegations, the name of the person or authority bringing such proceedings; the dates the proceedings were initiated and finally concluded; the style of the proceedings; and the findings made and actions taken in connection with those proceedings

- | | | YES | NO |
|-----|--|-----|----------|
| (E) | Has any formal, written disciplinary proceeding ever been Brought against Applicant by a disciplinary authority in any other jurisdiction within the last five years? _____ | | <u>X</u> |

If the answer was "yes," describe, as to each such proceeding, the nature of the allegations; the name of the person or authority bringing such proceedings; the date the proceedings were initiated and finally concluded; the style of the proceedings; and the findings made and actions taken in connection with those proceedings.

- | | | YES | NO |
|-----|---|-----|----------|
| (F) | Has Applicant been formally held in contempt or otherwise sanctioned by any court in a written order in the last five years for disobeying orders? _____ | | <u>X</u> |

If the answer was "yes," describe, as to each such order, the nature of the allegations, the name of the court before which such proceedings were conducted; the date of the contempt order or sanction, the caption of the proceedings, and the substances of the court's rulings (a copy of the written order or transcript of the oral rulings must be attached to the application).

- (G) Please identify each proceeding in which Applicant has filed an application to proceed pro hac vice in this state within the preceding two years, as follows:

**Name and Address
 of Court**

**Date of
 Application**

**Outcome of
 Application**

<i>State of Mississippi v. Nationwide</i> , 25CI1-18-CV-00215-TTG; Circuit Court for Hinds County, Mississippi, First Judicial District	January 25, 2019	Granted
<i>State of Mississippi v. Allstate</i> , 25CI1-18-CV-00212-TTG; Circuit Court for Hinds County, Mississippi, First Judicial District	July 3, 2018	Granted
<i>Huey v. Allstate Vehicle and Property Insurance Company</i> , 4:19-cv-00153 (N.D. Miss.)	January 15, 2020	Granted
<i>Tashal Shields, et al v. Metropolitan Property and Casualty Insurance Company</i> , 1:19-cv-222-GHD-RP (N.D. Miss.)	January 21, 2020	Granted

- (H) Please identify each case in which Applicant has appeared as counsel pro hac vice in this state within the immediately preceding twelve months, is presently appearing as counsel pro hac vice, or has pending applications for admission to appear pro hac vice, as follows:

Name and Address of Court	Style of Case
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State of Mississippi v. Nationwide, 25CI1-18-CV-00215-TTG; Circuit Court for Hinds County, Mississippi, First Judicial District

State of Mississippi v. Allstate, 25CI1-18-CV-00212-TTG; Circuit Court for Hinds County, Mississippi, First Judicial District

Huey v. Allstate Vehicle and Property Insurance Company, 4:19-cv-00153 (N.D. Miss.)

Tashal Shields, et al v. Metropolitan Property and Casualty Insurance Company,

1:19-cv-222-GHD-RP (N.D. Miss.)

YES

NO

- (I) **Has Applicant read and become familiar with all of the Local Uniform Civil Rules of the United States District Courts for The Northern and Southern Districts of Mississippi?**

 X

Has Applicant read and become familiar with the Mississippi Rules of Professional Conduct?

 X

- (J) Please provide the following information about the resident attorney who has been associated with this case:

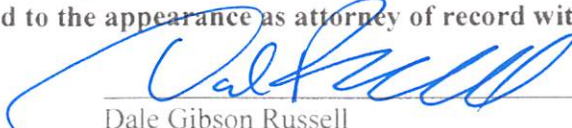
Name and Bar No. Dale G. Russell - MSB #10837

Address: Copeland Cook Taylor & Blush
1076 Highland Colony Parkway
Ridgeland, MS 39157

Phone 601-856-7200
Fax: 601-856-7626
Email: drussell@cctb.com


- (K) The undersigned resident attorney certifies that he/she agrees to the association with Applicant in this matter and to the appearance as attorney of record with Applicant.

6/16/2020
Date


Dale Gibson Russell

I certify that the information provided in this Application is true and correct.

6/15/2020
Date


Mark L. Hanover

Unless exempted by Local Rule 83.1(d)(5), the application fee established by this Court must be enclosed with this application

CERTIFICATE OF SERVICE

I, Dale Gibson Russell, attorney for Defendant, do hereby certify that I have served the Application for Admission Pro Hac to all counsel of record.

This the 16th day of June, 2020.

/s/ Dale Gibson Russell
Dale Gibson Russell